

ROBERT WISNIEWSKI  
ROBERT WISNIEWSKI P.C.  
225 Broadway, Suite 1020  
New York, NY 10007  
(212) 267-2101  
*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

-----X

WIOLETTA ZIELONKA and EWA WOJTULEWICZ,  
on behalf of themselves and all others similarly situated,

**Docket No.: 17-cv-1490**  
**(JLL) (JAD)**

-against-

**NOTICE OF MOTION**

SAREH BRIDAL, LLC and SAREH KHAJEHNOURI  
a/k/a SAREH NOURI,

Defendants.

-----X

PLEASE TAKE NOTICE that, upon the Memorandum of Law and Declaration of Robert Wisniewski submitted herewith, and upon oral argument as hereby requested, the undersigned will move this Court, before the Honorable Jose L. Linares, C.J., United States District Judge, in Courtroom 5D of the United States District Court for New Jersey, 50 Walnut Street, Newark, New Jersey, on June 18, 2018 or such date thereafter as the Court determines, for an order: 1) pursuant to Rule 60(b)(1) of the Federal Rules of Civil Procedure granting relief from the March 1, 2018 Order dismissing this matter with prejudice; 2) re-opening

the matter for further proceedings; and 3) granting such other and further relief as the Court deems just and proper.

Plaintiff respectfully requests oral argument.

Dated:       New York, New York  
                May 22, 2018

Respectfully submitted,

-----/s/-----  
Robert Wisniewski  
Robert Wisniewski P.C.  
225 Broadway, Suite 1020  
New York, NY 10007  
(212) 267-2101  
*Attorneys for Plaintiffs*